

ORIGINAL

RPD:CPK
F. #2007R00922

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

08 0490M

UNITED STATES OF AMERICA

FILED UNDER SEAL

- against -

COMPLAINT AND AFFIDAVIT
IN SUPPORT OF APPLICATION
FOR ARREST WARRANTS

YUN ZHOU ZHANG,
also known as "Jason Zhang,"
JIAN RONG JIANG,
also known as "Edward,"
LIN HU,
JIAN WANG,
HOY MUI CHEOW and
JIAN HU,
also known as "Mike,"

M. No. _____
(T. 18 U.S.C. § 2320)

Defendants.

EASTERN DISTRICT OF NEW YORK, SS:

RICHARD BRANDA, being duly sworn, deposes and says that he is a Special Agent of United States Immigration and Customs Enforcement, duly appointed according to law and acting as such.

Upon information and belief, in or about and between May 2005 and May of 2008, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants YUN ZHOU ZHANG, also known as "Jason Zhang," JIAN RONG JIANG, also known as "Edward," LIN HU, JIAN WANG, HOY MUI CHEOW and JIAN HU, also

known as "Mike," did knowingly and intentionally traffic or attempt to traffic in goods or services and knowingly use a counterfeit mark on and in connection with such goods and services.

(Title 18, United States Code, Section 2320)

The source of your deponent's information and the grounds for his belief are as follows:

1. I have been employed as a Special Agent by United States Immigration and Customs Enforcement ("ICE") for approximately ten years. During the course of my career with ICE and its predecessor agency, I have been involved in numerous investigations into cases involving narcotics, fraud, currency violations and counterfeit goods. The information contained in this affidavit is based upon the following: (i) surveillance, (ii) conversations with fellow ICE Agents and conversations with Officers and Import Specialists from United States Customs and Border Protection; (iii) conversations with representatives of Disney, Mattel, Inc., Marvel Comics, Viacom; (iv) review of documents relating to shipments imported via Newark Seaport; (v) review of documents received from the Westy Storage Center; (vi) review of bank records; (vii) review of telephone toll records and business records; (viii) review

of printed and electronic e-mails and attachments; (ix) review of shipping records; (x) review of New York State Department of Motor Vehicle records; and (xi) my training and experience as a Special Agent with ICE. Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

SEIZURES

A. 2005 Virginia Seizure

2. On May 5, 2005, ICE Special Agents assisted the Campbell County, Virginia Sheriff's Department and the Commonwealth of Virginia Office of the Attorney General during the execution of a search warrant at the Oriental Grocery & 99 Cent Store, located at 21556 Timberlake Road, Lynchburg, Virginia 24502. The Campbell County Sheriff's Department seized counterfeit merchandise¹ valued at \$296,930.00, including logo hats, NASCAR merchandise, Rolex watches, and Louis Vuitton handbags, from the store. During the search of the office area of the store, the

¹Throughout this affidavit, I refer to merchandise that is "counterfeit." I make this assertion in each instance based upon the submission of such merchandise, or photographs of it, to the entities that hold the trademarks for the merchandise, and the entities' subsequent analysis and conclusion that the merchandise is in fact counterfeit.

search team recovered invoices that showed that a portion of the counterfeit merchandise was supplied to the store by ZX Trading. Seized invoices identified 18-28 Troutman Street, Ridgewood, New York 11385 ("THE OFFICE PREMISES"), as ZX Trading's location.

B. The Bronx Crew

3. On January 18, 2007, Zeng Chen ("Zeng"), Jinkai Chen ("Jinkai") and Ping Zao (collectively, "the Bronx Crew") were arrested in a parking lot in the Bronx as they attempted to take delivery of approximately 192,000 individual three-packs of counterfeit Trojan brand condoms² (576,000 total). The Bronx Crew was subsequently indicted by the Bronx District Attorney's Office on charges of Trademark Counterfeiting in the First and Second Degree, in violation of New York State Penal Law Article 165.

4. In an August 30, 2007 declaration filed in a civil action brought in the United States District Court for the Eastern District of New York, Church & Dwight v.

²Trafficking in counterfeit condoms presents specific health and safety concerns. Authentic prophylactic devices are subject to regulatory and testing regimes applied both by their manufacturers and the United States Food and Drug Administration. Counterfeit condoms are not obligated to meet these standards and are not subject to the same testing requirements. As a result, they may not meet the minimum effectiveness requirements upon which the public relies.

Kaloti, Inc., et al., CV 07-612 (BMC) ("the Litigation"), Zeng, one of the Bronx Crew, stated that he purchased the counterfeit condoms from ZX Trading principal JIAN HU, also known as "Mike." Zeng further revealed that he and Jinkai received samples of the condoms from "Mike" after a meeting at THE OFFICE PREMISES only a few days prior to the Bronx Crew's arrest. According to Zeng's sworn declaration, at the above-referenced meeting at THE OFFICE PREMISES, "Mike" revealed "that he kept all of his purported Trojan Brand condoms at a storage facility located on Long Island."

5. On January 11, 2007 T-Mobile telephone toll records regarding cell number 718-702-8066 subscribed in the name LIN HU (the "LIN HU telephone") indicate an incoming call from telephone number 917-892-6899, which is subscribed in the name of Jinkai Chen (the "Chen telephone").

6. On January 15, 2007, T-Mobile telephone toll records for the LIN HU telephone, reveal an incoming call from, and an outgoing call to, the Chen telephone.

C. Syed Raza Guilty Plea

7. On October 4, 2006, Syed Raza ("Raza") pled guilty before United States Magistrate Judge Nathaniel Fox (SDNY) to one count of delivering for introduction into interstate commerce a drug, device or cosmetic that was

adulterated and misbranded under Title 21, U.S.C., 331(a) and 333(a)(I). Specifically, he pled guilty to making "numerous shipments of counterfeit Trojan-brand condoms" from New York to businesses in Texas, totaling 485,760 condoms.

D. Raza March 6, 2006 Condom Purchase

8. Syed Raza testified at deposition pursuant to the Litigation that he had purchased counterfeit Trojan condoms from YUN ZHOU ZHANG, also known as "Jason Zhang," in early 2006. As part of the payment for the counterfeit condoms, Raza wrote checks to defendant YUN ZHOU ZHANG, also known as "Jason Zhang" and Zhang's company, Top Sale Trade. RAZA also stated that he wrote checks with the payee section blank and gave them to YUN ZHOU ZHANG as payment for the counterfeit condoms. In a deposition provided in the course of the Litigation, the defendant YUN ZHOU ZHANG testified that he gave the checks to the defendant JIANG RONG JIANG as payment for condoms. New York State Division of Corporations records indicate that YUN ZHOU ZHANG incorporated Top Sale Trade inc. at 1193 Broadway, New York, N.Y. on December 24, 2003.

9. Cancelled checks in Raza's Commerce Bank account revealed that Syed Raza signed two checks dated

March 6, 2006. One was made payable to ZX Trading for \$29,600, and the other was made payable to AXA Enterprise Corp. The check payable to ZX Trading was deposited into Fleet/Bank of America account# 9420821025, an account for which the defendant LIN HU is the authorized signer. The check made payable to AXA Enterprise was deposited into account # 9421427652.

10. T-Mobile telephone toll records for cell phone number 917-683-7599 subscribed in the name of YUN ZHOU ZHANG (the "YUN ZHOU ZHANG telephone") reveal the following calls at or around the time Raza wrote the two checks to ZHANG as payment for the counterfeit condoms:

a. On March 5, 2006 at 8:23 pm: outgoing call to cellular telephone number 347-386-1512, subscribed in the name JIAN RONG JIANG (the "JIAN RONG JIANG telephone"), two minutes in duration;

b. On March 5, 2006 at 9:15 pm: incoming call from cellular telephone number 646-643-3770, subscribed in the name Syed Raza (the "Syed Raza telephone"), one minute in duration;

c. On March 5, 2006 at 9:31 pm: outgoing call to the Syed Raza telephone, one minute in duration;

d. On March 5, 2006 at 9:36 pm: incoming call

from the JIAN RONG JIANG telephone, one minute in duration;

e. On March 6, 2006 at 8:41 am: an incoming call from the JIAN RONG JIANG telephone, one minute in duration;

f. On March 6, 2006 at 10:22 am: outgoing call to the Syed Raza telephone, one minute in duration;

g. On March 6, 2006 at 10:23 am: outgoing call to the LIN HU telephone, one minute in duration;

h. On March 6, 2006 at 10:47 am: incoming call from the JIAN RONG JIANG, one minute in duration;

i. On March 6, 2006 at 10:56 AM: incoming call from the Syed Raza telephone, three minutes in duration;

j. On March 6, 2006 at 1:07 pm: incoming call from the Syed Raza telephone, three minutes in duration;

E. March 25, 2008 Undercover Purchase

11. On March 25, 2008, ICE Special Agents and ICE RAC/LI task force officers conducted an undercover purchase of merchandise at THE OFFICE PREMISES. An audio recording was made of the purchase.

12. On that date, an undercover officer ("UC") initially purchased general merchandise from the showroom area, where there were no items that appeared to be counterfeit. After ordering general merchandise and requesting items that would be in high demand in flea

markets, ninety-nine cent stores, and other locations where, based on my experience, counterfeit items are often sold, an employee later identified as the defendant HOY MUI CHEOW asked the UC if he was interested in buying "cartoon stuff" and, specifically, "Disney" material. Subsequently, CHEOW and an employee later identified as Min Chen ("Chen") took the UC to an office space off of the showroom and showed him name-brand items on a laptop computer screen. CHEOW informed the UC that these items were not kept at THE OFFICE PREMISES, but that they were maintained at a separate location. After discussion with CHEOW, the UC paid \$670.00 for merchandise with brand or trademark names including Disney, Mattel, Dora the Explorer and Marvel, and was asked to return in twenty minutes to pick up his order. The amount paid for this merchandise was far below the wholesale value of the items.

13. When the UC returned to THE OFFICE PREMISES, his order was contained in several boxes inside a white van (New York license plate number DTT5983) (the "WHITE VAN") parked outside THE OFFICE PREMISES. The van's driver, later identified as ZX Trading employee Aimin Chen ("Aimin") helped the UC load the boxes into the UC's vehicle. In addition, Chen, one of the showroom employees referenced

above, supplied a bag of counterfeit trading cards from inside THE OFFICE PREMISES.

F. March 28, 2008 Undercover Purchase

14. On March 28, 2008 ICE Special Agents and ICE RAC/LI task force officers, using video and audio recording devices, conducted an undercover purchase of counterfeit merchandise at THE OFFICE PREMISES. That purchase included counterfeit Disney, NY Yankee, North Face, Barbie and other name-brand or trademarked items. Upon entering the business, the UC was directed, as before, to an office space off of the main showroom at the location, where he was shown images of name brand merchandise, this time on a desktop computer. Chen, assisted by CHEOW, operated the computer. During this process, CHEOW requested the UC to provide her with advance notice in the event that he wanted to purchase "new stuff." After ordering the counterfeit merchandise referenced above, CHEOW informed the UC that his merchandise would have to be brought to THE OFFICE PREMISES from another location. CHEOW then printed a receipt and took the UC's money, \$711.00 in cash, for the purchase.

15. After the UC placed his order, Aimin, the employee who provided the UC with boxes of counterfeit goods from the van a few days earlier, took keys off of a wall in

THE OFFICE PREMISES, left the building, and got into the WHITE VAN. He drove the WHITE VAN, which had been parked in a lot near THE OFFICE PREMISES, directly to 199 Cook Street, Brooklyn, New York 11206 ("THE WAREHOUSE PREMISES").

16. Once at THE WAREHOUSE PREMISES, Aimin loaded five boxes into the WHITE VAN from THE WAREHOUSE PREMISES. Aimin then drove the WHITE VAN directly back to THE OFFICE PREMISES and unloaded the five boxes immediately inside THE OFFICE PREMISES' loading door aperture. When the UC returned, Aimin brought the boxes to the UC's vehicle. Subsequent inspection revealed that these boxes contained the counterfeit merchandise the UC viewed and purchased at THE OFFICE PREMISES. Additional counterfeit merchandise that had been ordered but not included within the boxes, was provided to the UC from within THE OFFICE PREMISES.

G. Customs and Border Protection Seizure

17. United States Customs and Border Protection records reflect a seizure of 48,000 counterfeit Crescent toothpaste sets, each including a toothbrush and toothpaste, on December 20, 2002 addressed to the incorporated address for ZX Trading (119-32 7th Avenue, College Point, New York 11356.)

H. November 2007 OFFICE PREMISES Seizure

18. On November 15, 2007, pursuant to a court order in the Litigation, representatives from Church & Dwight, the trademark holders for the Trojan brand, seized business records and two hundred and sixty eight counterfeit items from THE OFFICE PREMISES. The counterfeit items seized represented only a sample of ZX Trading's inventory there at that time. Although no condoms were seized (consistent with the defendant JIAN HU's reported assertion above, that they were stored in a facility on Long Island), counterfeit items that Church & Dwight recovered included merchandise purportedly from Disney, North Face, Nike, MLB, Sharpie, Apple and others.

I. THE DEFENDANTS

YUN ZHOU ZHANG (Broker)

1. ZHANG's 1999 Possession of Counterfeit Merchandise

19. From February 16, 1999 through June 28, 1999, U.S. Customs seized a total of thirteen shipments of counterfeit Oakley labels and sunglass bags, imported from China and addressed to 461 57th street, Brooklyn, New York, which was the defendant YUN ZHOU ZHANG's address at that time. The thirteen shipments totaled 66,064 pieces of labels

and sunglass bags. The domestic value was estimated to be \$153,772.00.

20. On February 25, 1999, agents conducted a controlled delivery using nine of the seized shipments of counterfeit merchandise addressed to 461 57th street, Brooklyn, NY. The agents observed the defendant YUN ZHOU ZHANG arrive and pick up three of the nine boxes from the Post Office. The agents followed ZHANG to his residence and observed ZHANG take the three boxes into his apartment. Agents approached ZHANG at his apartment and conducted an interview.

21. ZHANG advised agents that he had picked up the boxes for a relative whom he declined to identify. He stated that he had no idea he had done anything illegal. ZHANG advised that this relative would stop by the apartment at different times to pick up packages and stated that he had been picking up these packages for almost one year. ZHANG stated that he did not know what his relative was doing with the parcels and he did not know where his relative worked.

22. Agents advised ZHANG that the goods were counterfeit and that any further involvement in the trafficking of counterfeit goods could result in his arrest

and prosecution.

2. ZHANG's 2006 Sale of Counterfeit Condoms

23. In 2006, YUN ZHOU ZHANG brokered the sale of bulk quantities of counterfeit condoms to Syed Raza, which were supplied by ZX Trading and JIAN RONG JIANG. ZHANG testified at a deposition in the course of the Litigation that he stored and had access to the counterfeit condoms kept in the Westy storage center in Hicksville, New York.

24. ZHANG testified at a deposition pursuant to the Litigation that he signed a check for \$19,000 in January 2006 as partial payment for the counterfeit condoms he had bought which he then sold to Raza. The check was dated January 25, 2006 and the payee of the check was ZX Trading Corp. Zhang explained that he did not fill out the payee section of the check at the request of the defendant JIAN RONG JIANG, and he gave the check to JIAN RONG JIANG. ZHANG stated that he wrote, "Transportation fee, China" in the notes section of the check. The check was ultimately deposited into ZX Trading's Fleet/Bank of America account# 9420821025 (the "ZX Trading Bank Account"). I have been informed by representatives of the trademark holder for Trojan condoms that authentic Trojan condoms are manufactured only in the United States.

25. YUN ZHOU ZHANG also testified at the deposition that he spoke with a female who he knows as "A Fong" on the LIN HU telephone in the beginning of 2006 about the storage of condoms at the Westy storage facility in Hicksville, New York. ZHANG stated that she told him that the condoms would be stored at that facility. ZHANG also stated that JIAN RONG JIANG had a storage unit at the same Westy facility, on the first floor, where he helped unload condoms.

26. On January 25, 2006, T-Mobile telephone toll records for the YUN ZHOU ZHANG phone reveal the following:

a. Three incoming calls from the JIAN RONG JIANG telephone and one outgoing call to the JIAN RONG JIANG telephone;

b. Three incoming calls, and two outgoing call to the Syed Raza telephone.

27. Cancelled checks in Raza's Commerce Bank account reveal that Syed Raza signed two checks dated March 6, 2006. One was made payable to ZX Trading for \$29,600, and the other was made payable to AXA Enterprise Corp.

28. Raza testified that the checks were payment for counterfeit Trojan condoms that he bought from YUN ZHOU ZHANG in February of 2006 on consignment. Raza stated that

he was speaking to the defendant YUN ZHOU ZHANG about payment for the condoms, and he was receiving telephone calls from the defendant JIAN RONG JIANG, who stated that he, Raza, had to pay the defendant YUN ZHOU ZHANG for the counterfeit condoms. These condoms were sold for substantially below the wholesale price.

JIAN RONG JIANG (BROKER)

29. As noted above, the checks given in payment by Raza for the counterfeit condoms were ultimately received by defendant JIAN RONG JIANG and then deposited in the bank accounts of ZX Trading and AXA Enterprise.

30. One of the checks given in payment for the counterfeit condoms was provided by YUN ZHOU ZHANG to JIAN RONG JIANG with the payee section of the check blank as JIAN RONG JIANG had requested. YUN ZHOU ZHANG stated that he wrote, "Transportation fee, China" in the notes section of the check. The check was ultimately deposited into the ZX Trading Bank Account.

31. ZHANG identified JIAN RONG JIANG, during deposition testimony in the Litigation, from a photograph as the person he knows as "Edward", and stated that he purchased counterfeit condoms from him.

32. Westy storage center rental agreements reveal

that the defendant JIAN WANG rented the storage unit that contained the counterfeit condoms. In addition, two other units on the same floor that were previously rented in JIAN RONG JIANG's name were transferred to JIAN WANG's name. The contact telephone numbers listed were the JIAN RONG JIANG telephone and "JASON" at the YUN ZHOU ZHANG telephone.

LIN HU (ZX Principal/Supplier)

33. Records from New York State Division of Corporations indicate that the defendant LIN HU is the Chairman or Chief Executive Officer of AXA Enterprise Corporation.

34. Records from New York State Division of Corporations indicate that Jian Zhong Hu (who is not the defendant JIAN HU) is the Chairman or Chief Executive Officer of ZX Trading Corporation, and the Principal Executive Office is listed under the defendant LIN HU's name at the same address. This address, according to Lexis/Nexus records, is a former residential address for both individuals and a current address for Jian Zhong Hu.

35. Customs and Border Protection database queries revealed two seizures related to ZX Trading, and representatives from Church and Dwight seized counterfeit items from ZX Trading.

36. On March 21, 2008, Confidential Informant #1 ("CI1"), who pleaded guilty to violations of Title 18 U.S.C. Sections 1956 and 2320, and has provided reliable information in the past, stated that he had purchased counterfeit merchandise, between the years 2001-2003 from ZX Trading, located at THE OFFICE PREMISES. CI1 identified the defendant LIN HU from a series of photographs as the person he purchased the counterfeit goods from and as one of the owners of ZX Trading. CI1 also stated that there is an owner of ZX Trading in China who is not a U.S. Citizen.

37. The counterfeit condoms that were seized from the Bronx Crew were purchased directly from the defendant JIAN HU. Zeng Chen stated that he and Jinkai Chen received samples of the condoms at ZX Trading's business location at THE OFFICE PREMISES, a few days prior to their arrest on January 18, 2007.

38. On January 11, 2007, telephone toll record regarding a phone subscribed to the defendant LIN HU reveal an incoming call from telephone number 917-892-6899, which is subscribed to Jinkai Chen according to subscriber records provided by T-Mobile.

39. On January 15, 2007, toll records regarding a phone subscribed to LIN HU indicate an incoming call and an

outgoing call with a phone subscribed to Jinkai CHEN.

40. Telephone toll records reveal a call to a telephone subscribed to the defendant LIN HU, from the YUN ZHOU ZHANG telephone. The call was placed right after ZHANG made a call to Syed Raza, and just before a call to the defendant JIAN RONG JIANG. Those calls took place on March 6, 2006, the same date that Raza wrote checks, which were deposited into ZX Trading's accounts, as payment for counterfeit condoms.

41. Defendant LIN HU and Jian Zhong Hu are the authorized signers on the ZX Trading Bank Account where checks were deposited for the purchase of counterfeit condoms.

JIAN WANG (Bulk Purchaser)

42. Pursuant to a civil seizure Order executed on April 9, 2007 pursuant to the Litigation, state law enforcement authorities found over one million counterfeit Trojan condoms in the possession of the defendant JIAN WANG. The condoms were seized from a Westy storage unit (Unit 1d01), located at 65 West John Street Hicksville, New York 11701, and from the defendant JIAN WANG's, Dollar 99 Cent Mart, located at 140 Newbridge Road, Hicksville New York 11801.

43. As noted above, Westy storage center rental agreements reveal that the defendant JIAN WANG rented the storage unit that contained the counterfeit condoms. In addition, two other units on the same floor that were previously rented in JIAN RONG JIANG's name were transferred to JIAN WANG's name. The contact telephone numbers listed were the JIAN RONG JIANG telephone and "Jason" at the YUN ZHOU ZHANG telephone. These storage units were transferred into the defendant JIAN WANG's name shortly after counterfeit condoms were seized from Syed Raza in March, 2006. The defendant YUN ZHOU ZHANG testified in the Litigation that he told JIAN WANG that Syed Raza had been arrested for selling counterfeit condoms.

44. Toll records for Jinkai Chen's work number reveal calls to the defendant JIAN WANG on approximately three occasions: twice on July 17, 2006, and once on November 2, 2006. T-Mobile toll records for telephone number 516-808-0587, subscribed in the name of the defendant JIAN WANG reveal at least two calls to ZX Trading in Ridgewood, New York.

HOY MUI CHEOW (ZX Manager)

45. Based on surveillance, undercover purchases and seized business records it was determined that the

defendant HOY MUI CHEOW is employed at ZX Trading and manages sales at THE OFFICE PREMISES. She was present when business records and counterfeit merchandise was seized from ZX Trading on November 15, 2007.

46. During an audio recorded undercover purchase of counterfeit merchandise at THE OFFICE PREMISES on March 25, 2008, the defendant HOY MUI CHEOW offered Disney items to the UC, and stated that they can no longer keep those types of items in THE OFFICE PREMISES. During an audio/video recorded undercover purchase of counterfeit merchandise at THE OFFICE PREMISES on March 28 2008, the defendant HOY MUI CHEOW instructed Min Chen regarding the procedure to access images of the counterfeit inventory on computer files which were displayed to the UC. The UC purchased various counterfeit items, including counterfeit Disney products, on both occasions and paid the defendant HOY MUI CHEOW.

JIAN HU (ZX Principal/Supplier)

47. The defendant JIAN HU was captured on audio and video recordings inside THE OFFICE PREMISES asking the UC where he is selling the merchandise while the UC was viewing images of counterfeit items displayed to him on computer.

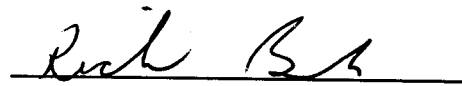
48. In an August 30, 2007 declaration filed in the course of the Litigation, Zeng Chen identified the defendant JIAN HU from a series of photographs and stated that the defendant JIAN HU provided the counterfeit condoms that were seized when he was arrested. Zeng Chen also declared that he has seen the defendant JIAN HU driving a white Lexus sport utility vehicle. Registration records from the New York State Department of Motor Vehicles indicate a white 2004 Lexus GX470 sport utility vehicle registered to JIAN HU.

STATUTORY AUTHORITY


49. I summarize herein the statutory authority relevant to the instant application. Title 18, U.S.C., Section 2320, Trafficking in Counterfeit Goods or Services, provides, in applicable part, that: "whoever intentionally traffics or attempts to traffic in goods or services and knowingly uses a counterfeit mark or in connection with such goods or services shall, if an individual, be fined not more than \$2,000,000 or imprisoned not more than 10 years, or

both" and shall be guilty of the felony trafficking in counterfeit goods or services.


WHEREFORE, I respectfully request that the Court issue arrest warrants for defendants YUN ZHOU ZHANG, also known as "Jason Zhang,", JIAN RONG JIANG, also known as "Edward," LIN HU, JIAN WANG, HOY MUI CHEOW and JIAN HU, also known as "Mike," so that they may be dealt with according to law and that the arrest warrants and this affidavit be sealed until further order of the Court.


Richard Branda
Special Agent, ICE

Sworn to before me this
28th day of May 2008.


HONORABLE MICHAEL L. ORENSTEIN
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

It is directed that this affidavit be kept under seal until further order of this Court.


HONORABLE MICHAEL L. ORENSTEIN
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK